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14 UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC
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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
20 LITIGATION

Case No. 3:23-md-03084-CRB

**AMENDED DECLARATION OF
MICHAEL B. SHORTNACY IN SUPPORT
OF DEFENDANTS' AMENDED MOTION
TO DISMISS CASES FOR FAILURE TO
COMPLY WITH PTO 10**

21 This Document Relates to:

22 *H.B. v. Uber Technologies, Inc., et al.*,
23 No. 3:23-cv-05949-CRB

24 *Grier v. Uber Technologies, Inc., et al.*,
25 No. 3:23-cv-05960-CRB

26 *Jane Doe LN v. Uber Technologies, Inc.,
et al.*, No. 3:24-cv-00120-CRB

27 *Jane Doe TW v. Uber Technologies, Inc.,
et al.*, No. 3:24-cv-00559-CRB
28

Date: December 12, 2025
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

Jane Doe DP v. Uber Technologies, Inc., et al., No. 3:24-cv-00573-CRB

Jane Doe LR v. Uber Technologies, Inc., et al., No. 3:24-cv-04306-CRB

Jane Doe BW v. Uber Technologies, Inc., et al., No. 3:24-cv-04308-CRB

Jane Doe ST v. Uber Technologies, Inc., et al., No. 3:24-cv-04309-CRB

Jane Doe AR v. Uber Technologies, Inc., et al., No. 3:24-cv-04313-CRB

Jane Doe JB v. Uber Technologies, Inc., et al., No. 3:24-cv-04316-CRB

Jane Doe VB v. Uber Technologies, Inc., et al., No. 3:24-cv-04317-CRB

Jane Doe KH v. Uber Technologies, Inc., et al., No. 3:24-cv-04326-CRB

Jane Doe SF v. Uber Technologies, Inc., et al., No. 3:24-cv-04327-CRB

Jane Doe SR v. Uber Technologies, Inc., et al., No. 3:24-cv-04332-CRB

Jane Doe MC v. Uber Technologies, Inc., et al., No. 3:24-cv-04334-CRB

Jane Doe SG v. Uber Technologies, Inc., et al., No. 3:24-cv-04353-CRB

Jane Doe TW v. Uber Technologies, Inc., et al., No. 3:24-cv-04356-CRB

Jane Doe VL v. Uber Technologies, Inc., et al., No. 3:24-cv-04357-CRB

Jane Doe SW v. Uber Technologies, Inc., et al., No. 3:24-cv-04358-CRB

Jane Doe DM v. Uber Technologies, Inc., et al., No. 3:24-cv-04359-CRB

Jane Doe GA v. Uber Technologies, Inc., et al., No. 3:24-cv-04361-CRB

Jane Doe SW v. Uber Technologies, Inc., et al., No. 3:24-cv-04364-CRB

1 *Jane Doe JG v. Uber Technologies, Inc.,*
2 *et al.*, No. 3:24-cv-04368-CRB

3 *Jane Doe KY v. Uber Technologies, Inc.,*
4 *et al.*, No. 3:24-cv-04369-CRB

5 *Jane Doe DC v. Uber Technologies, Inc.,*
6 *et al.*, No. 3:24-cv-04373-CRB

7 *Jane Doe PC v. Uber Technologies, Inc.,*
8 *et al.*, No. 3:24-cv-04374-CRB

9 *Jane Doe DB v. Uber Technologies, Inc.,*
10 *et al.*, No. 3:24-cv-04428-CRB

11 *S.K. v. Uber Technologies, Inc., et al.,*
12 No. 3:24-cv-04669-CRB

13 *B.T. v. Uber Technologies, Inc., et al.,*
14 No. 3:24-cv-04670-CRB

15 *WHB 304 v. Uber Technologies, Inc., et*
16 *al.*, No. 3:24-cv-04801-CRB

17 *WHB 1882 v. Uber Technologies, Inc., et*
18 *al.*, No. 3:24-cv-04813-CRB

19 *WHB 322 v. Uber Technologies, Inc., et*
20 *al.*, No. 3:24-cv-4814-CRB

21 *WHB 1478 v. Uber Technologies, Inc., et*
22 *al.*, No. 3:24-cv-04833-CRB

23 *WHB 188 v. Uber Technologies, Inc., et*
24 *al.*, No. 3:24-cv-04834-CRB

25 *WHB 1123 v. Uber Technologies, Inc., et*
26 *al.*, No. 3:24-cv-04850-CRB

27 *WHB 1144 v. Uber Technologies, Inc., et*
28 *al.*, No. 3:24-cv-04859-CRB

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WHB 199 v. Uber Technologies, Inc., et
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5 *WHB 1462 v. Uber Technologies, Inc., et*
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7 *WHB 1531 v. Uber Technologies, Inc., et*
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9 *WHB 1847 v. Uber Technologies, Inc., et*
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11 *WHB 1858 v. Uber Technologies, Inc., et*
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13 *WHB 1670 v. Uber Technologies, Inc., et*
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15 *WHB 1936 v. Uber Technologies, Inc., et*
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17 *WHB 757 v. Uber Technologies, Inc., et*
18 *al.*, No. 3:24-cv-04954-CRB

19 *WHB 1387 v. Uber Technologies, Inc., et*
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22 *al.*, No. 3:24-cv-04969-CRB

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25 *WHB 1638 v. Uber Technologies, Inc., et*
26 *al.*, No. 3:24-cv-04975-CRB

27 *WHB 974 v. Uber Technologies, Inc., et*
28 *al.*, No. 3:24-cv-04977-CRB

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2 *al.*, No. 3:24-cv-05015-CRB

3 *WHB 1269 v. Uber Technologies, Inc., et*
4 *al.*, No. 3:24-cv-05025-CRB

5 *WHB 400 v. Uber Technologies, Inc., et*
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7 *WHB 999 v. Uber Technologies, Inc., et*
8 *al.*, No. 3:24-cv-05036-CRB

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10 *al.*, No. 3:24-cv-05037-CRB

11 *WHB 755 v. Uber Technologies, Inc., et*
12 *al.*, No. 3:24-cv-05039-CRB

13 *WHB 3 v. Uber Technologies, Inc., et al.*,
14 No. 3:24-cv-05061-CRB

15 *WHB 599 v. Uber Technologies, Inc., et*
16 *al.*, No. 3:24-cv-05062-CRB

17 *WHB 1606 v. Uber Technologies, Inc., et*
18 *al.*, No. 3:24-cv-05066-CRB

19 *Jane Doe (C.A.) v. Uber Technologies,*
20 *Inc., et al.*, No. 3:24-cv-05072-CRB

21 *Jane Doe KC v. Uber Technologies, Inc.,*
22 *et al.*, No. 3:24-cv-05073-CRB

23 *Jane Doe RD v. Uber Technologies, Inc.,*
24 *et al.*, No. 3:24-cv-05074-CRB

25 *Jane Doe TD v. Uber Technologies, Inc.,*
26 *et al.*, No. 3:24-cv-05075-CRB

27 *Jane Doe JH v. Uber Technologies, Inc.,*
28 *et al.*, No. 3:24-cv-05079-CRB

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WHB 1865 v. Uber Technologies, Inc., et
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WHB 1967 v. Uber Technologies, Inc., et
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1 *WHB 649 v. Uber Technologies, Inc., et*
2 *al.*, No. 3:24-cv-05095-CRB

3 *WHB 862 v. Uber Technologies, Inc., et*
4 *al.*, No. 3:24-cv-05097-CRB

5 *Jane Doe JM v. Uber Technologies, Inc.,*
6 *et al.*, No. 3:24-cv-05108-CRB

7 *Jane Doe JB v. Uber Technologies, Inc.,*
8 *et al.*, No. 3:24-cv-05109-CRB

9 *Jane Doe EB v. Uber Technologies, Inc.,*
10 *et al.*, No. 3:24-cv-05110-CRB

11 *Jane Doe AE v. Uber Technologies, Inc.,*
12 *et al.*, No. 3:24-cv-05121-CRB

13 *WHB 1386 v. Uber Technologies, Inc., et*
14 *al.*, No. 3:24-cv-05128-CRB

15 *WHB 1425 v. Uber Technologies, Inc., et*
16 *al.*, No. 3:24-cv-05129-CRB

17 *WHB 427 v. Uber Technologies, Inc., et*
18 *al.*, No. 3:24-cv-05132-CRB

19 *John Doe DG v. Uber Technologies,*
20 *Inc., et al.*, No. 3:24-cv-05169-CRB

21 *Jane Doe KH v. Uber Technologies, Inc.,*
22 *et al.*, No. 3:24-cv-05174-CRB

23 *WHB 1382 v. Uber Technologies, Inc., et*
24 *al.*, No. 3:24-cv-05232-CRB

25 *WHB 428 v. Uber Technologies, Inc., et*
26 *al.*, No. 3:24-cv-05236-CRB

27 *WHB 1962 v. Uber Technologies, Inc., et*
28 *al.*, No. 3:24-cv-05240-CRB

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1 *WHB 1909 v. Uber Technologies, Inc., et*
2 *al.*, No. 3:24-cv-05280-CRB

3 *WHB 662 v. Uber Technologies, Inc., et*
4 *al.*, No. 3:24-cv-05355-CRB

5 *WHB 1338 v. Uber Technologies, Inc., et*
6 *al.*, No. 3:24-cv-05434-CRB

7 *WHB 704 v. Uber Technologies, Inc., et*
8 *al.*, No. 3:24-cv-05436-CRB

9 *WHB 1476 v. Uber Technologies, Inc., et*
10 *al.*, No. 3:24-cv-05450-CRB

11 *WHB 1888 v. Uber Technologies, Inc., et*
12 *al.*, No. 3:24-cv-05457-CRB

13 *WHB 335 v. Uber Technologies, Inc., et*
14 *al.*, No. 3:24-cv-05460-CRB

15 *WHB 1048 v. Uber Technologies, Inc., et*
16 *al.*, No. 3:24-cv-05462-CRB

17 *WHB 1443 v. Uber Technologies, Inc., et*
18 *al.*, No. 3:24-cv-05472-CRB

19 *WHB 1596 v. Uber Technologies, Inc., et*
20 *al.*, No. 3:24-cv-05473-CRB

21 *WHB 58 v. Uber Technologies, Inc., et*
22 *al.*, No. 3:24-cv-05477-CRB

23 *WHB 1593 v. Uber Technologies, Inc., et*
24 *al.*, No. 3:24-cv-05504-CRB

25 *WHB 1673 v. Uber Technologies, Inc., et*
26 *al.*, No. 3:24-cv-05552-CRB

27 *WHB 1860 v. Uber Technologies, Inc., et*
28 *al.*, No. 3:24-cv-05568-CRB

WHB 1613 v. Uber Technologies, Inc., et
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WHB 1053 v. Uber Technologies, Inc., et
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WHB 519 v. Uber Technologies, Inc., et
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WHB 393 v. Uber Technologies, Inc., et
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1 *WHB 1416 v. Uber Technologies, Inc., et*
2 *al.*, No. 3:24-cv-05667-CRB

3 *WHB 1843 v. Uber Technologies, Inc., et*
4 *al.*, No. 3:24-cv-05693-CRB

5 *WHB 505 v. Uber Technologies, Inc., et*
6 *al.*, No. 3:24-cv-05709-CRB

7 *Jane Doe SK v. Uber Technologies, Inc.,*
8 *et al.*, No. 3:24-cv-05710-CRB

9 *Jane Doe AM v. Uber Technologies, Inc.,*
10 *et al.*, No. 3:24-cv-05765-CRB

11 *WHB 413 v. Uber Technologies, Inc., et*
12 *al.*, No. 3:24-cv-05782-CRB

13 *WHB 1317 v. Uber Technologies, Inc., et*
14 *al.*, No. 3:24-cv-05791-CRB

15 *WHB 1481 v. Uber Technologies, Inc., et*
16 *al.*, No. 3:24-cv-05794-CRB

17 *WHB 695 v. Uber Technologies, Inc., et*
18 *al.*, No. 3:24-cv-05799-CRB

19 *Jane Doe AR v. Uber Technologies, Inc.,*
20 *et al.*, No. 3:24-cv-05947-CRB

21 *WHB 885 v. Uber Technologies, Inc., et*
22 *al.*, No. 3:24-cv-05952-CRB

23 *WHB 520 v. Uber Technologies, Inc., et*
24 *al.*, No. 3:24-cv-05954-CRB

25 *Jane Doe AS v. Uber Technologies, Inc.,*
26 *et al.*, No. 3:24-cv-05960-CRB

27 *WHB 678 v. Uber Technologies, Inc., et*
28 *al.*, No. 3:24-cv-05961-CRB

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Jane Doe GT v. Uber Technologies, Inc.,
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John Doe EW v. Uber Technologies,
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Jane Doe JS v. Uber Technologies, Inc., et al., No. 3:24-cv-06075-CRB

Jane Doe SS v. Uber Technologies, Inc., et al., No. 3:24-cv-06076-CRB

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Jane Doe 691532 v. Uber Technologies, Inc., et al., No. 3:24-cv-06643-CRB

Jane Doe NLG MR v. Uber Technologies, Inc., et al., No. 3:24-cv-07677-CRB

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Jane Doe NLG-GH v. Uber Technologies, Inc., et al., No. 3:24-cv-08078-CRB

Jane Doe NLG-MC v. Uber Technologies, Inc., et al., No. 3:24-cv-08091-CRB

Jane Doe NLG VK v. Uber Technologies, Inc., et al., No. 3:24-cv-08610-CRB

Jane Doe NLG TJ v. Uber Technologies, Inc., et al., No. 3:24-cv-08621-CRB

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1 *John Doe NLG GH v. Uber*
2 *Technologies, Inc., et al.*, No. 3:25-cv-
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3 *Jane Doe NLG PO v. Uber*
4 *Technologies, Inc., et al.*, No. 3:25-cv-
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5 *Jane Doe NLG LB v. Uber Technologies,*
6 *Inc., et al.*, No. 3:25-cv-00365-CRB

7 *Jane Doe NLG BH v. Uber*
8 *Technologies, Inc., et al.*, No. 3:25-cv-
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9 *Jane Doe NLG RC v. Uber Technologies,*
10 *Inc., et al.*, No. 3:25-cv-00371-CRB

11 *Jane Doe NLG BE v. Uber Technologies,*
12 *Inc., et al.*, No. 3:25-cv-00401-CRB

13 *Jane Doe NLG KK v. Uber*
14 *Technologies, Inc., et al.*, No. 3:25-cv-
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15 *Jane Doe NLG HK v. Uber*
16 *Technologies, Inc., et al.*, No. 3:25-cv-
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17 *Jane Doe NLG JN v. Uber Technologies,*
18 *Inc., et al.*, No. 3:25-cv-00715-CRB

19 *Jane Doe NLG AJ v. Uber Technologies,*
20 *Inc., et al.*, No. 3:25-cv-00717-CRB

21 *Jane Doe NLG DO v. Uber*
22 *Technologies, Inc., et al.*, No. 3:25-cv-
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23 *Jane Doe NLG CM v. Uber*
24 *Technologies, Inc., et al.*, No. 3:25-cv-
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25 *Jane Doe NLG KK v. Uber*
26 *Technologies, Inc., et al.*, No. 3:25-cv-
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27 *Jane Doe NLG KS v. Uber Technologies,*
28 *Inc., et al.*, No. 3:25-cv-01076-CRB

1 *Jane Doe NLG AB v. Uber Technologies,*
2 *Inc., et al., No. 3:25-cv-01079-CRB*

3 *Jane Doe NLG HB v. Uber*
4 *Technologies, Inc., et al., No. 3:25-cv-*
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7 *Inc., et al., No. 3:25-cv-01090-CRB*

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9 *al., No. 3:25-cv-01178-CRB*

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11 *al., No. 3:25-cv-01211-CRB*

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13 *al., No. 3:25-cv-01229-CRB*

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15 *al., No. 3:25-cv-01245-CRB*

16 *WHB 2056 v. Uber Technologies, Inc., et*
17 *al., No. 3:25-cv-01246-CRB*

18 *Jane Doe NLG KL v. Uber Technologies,*
19 *Inc., et al., No. 3:25-cv-01265-CRB*

20 *Jane Doe NLG AH v. Uber*
21 *Technologies, Inc., et al., No. 3:25-cv-*
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23 *Jane Doe NLG- CR v. Uber*
24 *Technologies, Inc., et al., No. 3:25-cv-*
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26 *Jane Doe NLG- BH v. Uber*
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28 *01719-CRB*

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1 *Jane Doe NLG- CP v. Uber*
2 *Technologies, Inc., et al.*, No. 3:25-cv-
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3 *Jane Doe NLG- JF v. Uber*
4 *Technologies, Inc., et al.*, No. 3:25-cv-
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5 *Jane Doe NLG- BB v. Uber*
6 *Technologies, Inc., et al.*, No. 3:25-cv-
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7 *Jane Doe NLG- AM v. Uber*
8 *Technologies, Inc., et al.*, No. 3:25-cv-
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9 *Jane Doe NLG- WB v. Uber*
10 *Technologies, Inc., et al.*, No. 3:25-cv-
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11 *Jane Doe NLG- JJ v. Uber Technologies,*
12 *Inc., et al.*, No. 3:25-cv-01804-CRB

13 *Jane Doe NLG- KD v. Uber*
14 *Technologies, Inc., et al.*, No. 3:25-cv-
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15 *Jane Doe NLG- RS v. Uber*
16 *Technologies, Inc., et al.*, No. 3:25-cv-
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17 *Jane Doe NLG- KG v. Uber*
18 *Technologies, Inc., et al.*, No. 3:25-cv-
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19 *Jane Doe NLG- JN v. Uber*
20 *Technologies, Inc., et al.*, No. 3:25-cv-
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21 *Jane Doe NLG- DS v. Uber*
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23 *Jane Doe NLG- JD v. Uber*
24 *Technologies, Inc., et al.*, No. 3:25-cv-
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25 *Jane Doe 691046 v. Uber Technologies,*
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26 *Jane Doe NLG- VM v. Uber*
27 *Technologies, Inc., et al.*, No. 3:25-cv-
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2 *Jane Doe NLG-KM v. Uber*
 3 *Technologies, Inc., et al., No. 3:25-cv-*
 4 *02706-CRB*

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6 *Jane Doe NLG-KO v. Uber*
 7 *Technologies, Inc., et al., No. 3:25-cv-*
 8 *02787-CRB*

9 *Jane Doe NLG-RR v. Uber*
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 10 *02788-CRB*

11 *Jane Doe NLG-AH v. Uber*
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 12 *02797-CRB*

13 *Jane Doe NLG-AV v. Uber*
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15 *Jane Doe NLG-KM v. Uber*
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 16 *02856-CRB*

17 *M.V. v. Uber Technologies, Inc., et al.,*
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18 *Jane Doe NLG-BC v. Uber*
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 19 *02899-CRB*

20 *Jane Doe NLG-LB v. Uber Technologies,*
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21 *Jane Doe NLG-PB v. Uber*
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 22 *02938-CRB*

23 *Jane Doe NLG-KM v. Uber*
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 24 *02956-CRB*

25 *Rivera v. Uber Technologies, Inc., et al.,*
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26 *Jane Doe NLG VT v. Uber Technologies,*
 27 *Inc., et al., No. 3:25-cv-03789-CRB*

1 *Jane Doe NLG-EC v. Uber*
2 *Technologies, Inc., et al.*, No. 3:25-cv-
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3 *John Doe-RM v. Uber Technologies,*
4 *Inc., et al.*, No. 3:25-cv-04152-CRB

5 *Jane Doe NLG-SW v. Uber*
6 *Technologies, Inc., et al.*, No. 3:25-cv-
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7 *DLB v. Uber Technologies, Inc., et al.*,
8 No. 3:25-cv-04371-CRB

9 *V.D. v. Uber Technologies, Inc., et al.*,
10 No. 3:25-cv-04742-CRB

11 *S.M. v. Uber Technologies, Inc., et al.*,
12 No. 3:25-cv-04803-CRB

13 *A.B. v. Uber Technologies, Inc., et al.*,
14 No. 3:25-cv-04856-CRB

15 *Jane Doe NLG-PL v. Uber Technologies,*
16 *Inc., et al.*, No. 3:25-cv-05014-CRB

17 *Jane Doe NLG-PA v. Uber*
18 *Technologies, Inc., et al.*, No. 3:25-cv-
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19 *Jane Doe NLG-YM v. Uber*
20 *Technologies, Inc., et al.*, No. 3:25-cv-
05109-CRB

21 *Jane Doe NLG-MH v. Uber*
22 *Technologies, Inc., et al.*, No. 3:25-cv-
05163-CRB

AMENDED DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Defendants”) amended motion to dismiss the cases of certain Plaintiffs for noncompliance with Pretrial Order No. 10 (“PTO 10”).

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Defendants in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of California, the Bar of the District of Columbia, and the Bar of the State of New York. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On December 28, 2023, this Court entered PTO 10 in this matter, requiring each Plaintiff to submit a “substantially complete” Plaintiff Fact Sheet (“PFS”) that “[i]nclude[d] a signed declaration” or verification that the PFS answers are true and correct. ECF No. 348 at 6-7. The Court also provided firm deadlines by which Plaintiffs must submit their PFS and supporting documents. *Id.* at 5-6.

4. On November 18, 2024, Magistrate Judge Cisneros expressly rejected Plaintiffs’ position that PTO 10’s verification requirement did not apply to amended PFS, and ordered Plaintiffs to submit verifications for any then-unverified PFS amendments within 30 days of the Court’s Order, and, moving forward, “in conjunction with any further amendments.” ECF No. 1877 at 3.

5. Attached to this declaration as **Exhibit A** is a table identifying 216 Plaintiffs who, as of October 20, 2025, have failed to submit a verification of their most recent amended PFS responses. The dates Plaintiffs filed their most recent PFS without the required verification are also identified in the table at Exhibit A.

6. On September 18, 2025, in an effort to secure compliance without intervention by the Court, Defendants’ counsel sent a Notice of Deficiency to each of the 216 Plaintiffs, reminding them

1 of Plaintiffs' non-compliance with this Court's order to provide a verification of Plaintiffs' most recent
 2 amended PFS responses, but none of these Plaintiffs have subsequently submitted a verification or
 3 otherwise responded.

4 7. Separately, on September 9, 2025, this Court entered PTO 31, requiring ninety
 5 specifically identified Plaintiffs to, within thirty days of entry of PTO 31, "either (i) produce a bona
 6 fide ride receipt to Defendants via MDL Centrality, or (ii) serve a statement indicating that the Plaintiff
 7 is unable to locate the receipt, explaining in detail the reasonable efforts that have been undertaken by
 8 Plaintiff to search their email and the Uber app for the receipt, and explaining why Plaintiff has been
 9 unable to locate the receipt." ECF No. 3877. As permitted by PTO 31, Uber identified a second batch
 10 of 213 Plaintiffs who were subject to PTO 31's requirements and gave these Plaintiffs written notice;
 11 they were due to comply with PTO 31 by October 13, 2025. With those deadlines now passed, as of
 12 October 16, 2025 (giving Plaintiffs a four-day grace period beyond their October 12 deadline) only 74
 13 out of 303 (or just over 24% of) Plaintiffs subject to PTO 31 have complied with this Order of the
 14 Court.

15
 16 I declare under penalty of perjury under the laws of the State of California that the foregoing
 17 is true and correct.

18 Executed on October 22, 2025 in Los Angeles, California.

19 **SHOOK, HARDY & BACON L.L.P.**

20 /s/ Michael B. Shortnacy

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23 **SHOOK, HARDY & BACON L.L.P.**

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UBER TECHNOLOGIES, INC., RASIER,
 LLC, and RASIER-CA, LLC